

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GOAT FASHION LIMITED,

Plaintiff,

Civil No. 19-CV-11045-PAE

-vs-

1661, INC.,

Defendant.  
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March 18, 2020

By ECF

Hon. Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007

Re: *Joint Letter Pursuant to March 18, 2020 Conference Call*

Dear Judge Engelmayer:

Please accept this as the parties' joint letter pursuant to the Court's March 18, 2020 Conference Call regarding Plaintiff's Motion for a Preliminary Injunction.

On March 17, 2020, Plaintiff's counsel, Thomas A. Telesca, Esq. contacted the Court to discuss the logistics of seeking a Temporary Restraining Order (TRO) in connection with Plaintiff's Motion for a Preliminary Injunction. A conference call with the Court was scheduled and held this morning at 9:30 a.m. After discussing the application with the Court, the Court suggested, and the parties agreed, that Plaintiff would move for a preliminary injunction without seeking a TRO and that the parties will work together in good faith to develop a six (6) week briefing schedule for Plaintiff's motion, including discovery, if needed, with the understanding that the

Hon. Paul A. Engelmayer, U.S.D.J.

March 18, 2020

Page 2

briefing schedule may require adjustments in light of the COVID-19 pandemic. As such, the parties have agreed to the following deadlines:

1. Plaintiff shall file its moving papers on or before Monday, March 23, 2020;
2. The parties shall advise each other as to what mode(s) of discovery are requested, if any, within three (3) days of the filing date of Plaintiff's motion;
3. The parties shall work in good faith to facilitate the discovery requested;
4. Defendant shall file its opposition papers on or before April 24, 2020; and
5. Plaintiff shall file its reply papers on or before May 4, 2020.

In light of the unusual circumstances concerning the COVID-19 pandemic, Defendant agrees that any delay with respect to briefing Plaintiff's motion will not be held against Plaintiff.

Respectfully submitted,

Ruskin Moscou Faltischek, P.C.

By: /s/ Thomas A. Telesca  
Thomas A. Telesca  
*Attorney for Plaintiff*

Cc: All counsel (by ECF)

Ballard Spahr LLP

By: /s/ Lynn E. Rzonca  
Lynn E. Rzonca  
*Attorney for Defendant*

SO ORDERED

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HON. PAUL A. ENGELMAYER  
U.S. DISTRICT COURT JUDGE